



INTEROFFICE MEMORANDUM

DATE: July 9, 1998
TO: Vern Guthrie
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FROM: John P. Schmuck

SUBJECT: Task 01, Plan No. 01, CAP Id No. 98-000759

Conclusion

The sampling and analysis conducted at Building 123 relied upon existing site procedures. In combination, the existing site procedures produced a body of B123 data adequate: for industrial hygiene determinations; for hazardous, solid and Polychlorinated Biphenyl (PCB) waste characterization; and for satisfaction of waste acceptance criteria of offsite disposal facilities.

Deficiency

The quality of the data generated from Building 123 sampling operation conducted without Sampling and Analysis Plans and associated Data Quality Objectives is indeterminate. A SAP was not used from some Building 123 D&D characterization sampling operations as required by 40 CFR 300.415(b)(4)(ii); RFCA, Part 4, and Appendix 3, section 3.2; and as prescribed by DOE Decommissioning Handbook, Section 7.

Task

A competent person shall review the Reconnaissance Level Characterization Plan and Report to verify that methods used for the sampling, analysis, and characterization were adequate for the required objective.

Background

In the National Contingency Plan, EPA requires the preparation of approved sampling and analysis plans (SAPs) for both removal and remedial actions. EPA's authority in this area stems from the need to control the quality of data used to assess the extent of contamination and the actual performance of the cleanup actions.

In contrast, for the generation, characterization and disposal of solid, hazardous and PCB wastes, the EPA RCRA and TSCA programs have developed a body of permissive regulations and supporting guidance that operate in lieu of SAPs. The regulations rely on a body of guidance known as SW846. SW846 is comprehensive in its coverage of sampling methods, statistical issues, analytical methods and quality assurance requirements. Fundamentally, it would be impossible for the regulated community to develop and obtain regulator approval on a SAP every time a waste is generated.

In addition, the regulations allow waste generators to apply other knowledge, gained as a result of waste management experience, to substitute for, or to complement analytical data. This is referred to as "knowledge of process" and in some instances obviates the need for any data collection. At RFETS, the WSRIC books are the means used to document process knowledge.

ADMIN. RECORD

B123-A-000129

Required Objectives

The required objectives included collection of sufficient data to: select appropriate personal protective equipment; to characterize the waste; and to satisfy the waste acceptance criteria of the offsite disposal facilities.

Basis for Conclusion

Clearly a regulator-approved SAP is indicated whenever the extent of environmental contamination is being evaluated or the success of an action is being verified. SAP approval in these situations is appropriate because the data may be used for subsequent decisions regarding human and environmental risks. It is risk-based decisions that are at the heart of the regulatory authorities.

In contrast, SW846 can operate in lieu of an approved SAP when waste characterization and disposal is being conducted. At REFTS, a combination of RCRA waste generator training, generic RFETS waste sampling procedures, (ie. L6245-F and L69294-A) and the WSRIC D&D book alone combine to provide sufficient structure to meet the required objectives. The added detail provided in the *Reconnaissance Level Characterization Plan For Building 123* served to complement SW846 and the other site procedures.

It is also important to recognize that approval of D&D Reconnaissance Level Characterization Plans (RLCP) is not currently required in the Decommissioning Program Plan (DPP) that has recently completed the public comment cycle. In parallel, the team that is updating the RFCA Implementation Guidance Document (IGD) is moving to separate D&D from the Environmental Restoration discussions. The assessment relied upon the Environmental Restoration discussions as authority to compel regulator approval of waste management based SAPs. In the future, the sections of the IGD discussing decommissioning documents will have independent language regarding RLCP approval requirements that is based upon the approved DPP.